REMARKS

Claims 1-6 are pending. Claims 1-6 are amended, claims 7-18 are added, and no claim is canceled. Claims 1-18 are pending upon entry of this amendment.

CLAIMS NOW RECITE STATUTORY SUBJECT MATTER

Claims 1-6 are rejected under 35 USC § 101 as allegedly being directed to non-statutory subject matter. Specifically, the Office Action argued that claim 1 itself does not disclose any hardware component to realize any of the recited functionality. Claim 1 has been amended to now recite "the custom knowledge base comprises a relational database comprising source and target code patterns and attributes a relational database comprising source and target code patterns and attributes and residing on a non-transitory computer-readable storage medium" and thus is statutory under 35 USC § 101. The dependent claims are statutory for at least the same reason. Accordingly, withdrawal of the § 101 rejections is respectfully requested.

CLAIMS NOW NOT OBVIOUS

Claims 1-6 stand rejected under 35 USC § 103(a) as allegedly being unpatentable over U.S. Patent No. 5,678,044 to Pastilha et al. ("Pastilha") in view of U.S. Patent Application Publication No. 2003/0225927 to Goodman, et al. ("Goodman").

Independent claim 1 has been amended to now recite, inter alia, the following:

> ...
> a processing means for conversion of source code into a format of the target environment specification, wherein the source code is passed through a knowledge engine for a plurality of iterations, the knowledge engine remains coupled to the custom knowledge base during the plurality of iterations for conversion of the source code into the format of the target environment specification, the knowledge base is updated to include additional structured information of the source platform and the source application with respect to the target platform and the target environment specification after each iteration to

cause the knowledge engine to enhance source code conversion in subsequent iterations;
...

As amended, claim 1 beneficially recites an apparatus for converting software code of a source application on a source platform into software code of a target application on a target platform. The apparatus includes a processing means that passes multiple iterations of the source code of the source application through a knowledge engine. After each iteration, a knowledge base coupled to the knowledge engine is updated to include additional structured information of the source platform and the source application with respect to the target platform and the target environment specification. The additional structured information causes the knowledge engine to enhance source code conversion in subsequent iterations. This technique beneficially achieves, for example, a high rate of automatic conversion of software code. The added independent claims 7 and 13 recite similar claimed features.

Pastilha, among other differences, does not disclose the above cited claim limitations. Pastilha, in contrast, discloses a system and method for automated rehosting of a software system from a source environment to a target environment. (See Pastilha, Abstract). Pastilha gathers all pertinent information about a software application, uses the gathered information to evaluate the suitability for rehosting the software application, and if suitable migrates the software application to the target environment. (See Pastilha, col. 4, line 59 to col. 5, line 12). However, Pastilha does not disclose the claimed feature of "wherein the source code is passed through a knowledge engine for a plurality of iterations, the knowledge engine remains coupled to the custom knowledge base during the plurality of iterations for conversion of the source code into the format of the target environment specification, the

knowledge base is updated to include additional structured information of the source platform and the source application with respect to the target platform and the target environment specification after each iteration to cause the knowledge engine to enhance source code conversion in subsequent iterations".

Goodman also fails to disclose the claimed elements not taught by Pastilha. Goodman discloses a method and system for migrating a computing environment from a source computing platform to a destination computing platform by parsing a script and selectively applying genetic data to provide settings on the destination computing platform that are similar to the source computing platform. See Goodman, Abstract. Similar to Pastilha, Goodman also does not disclose the claimed features of "wherein the source code is passed through a knowledge engine for a plurality of iterations, the knowledge engine remains coupled to the custom knowledge base during the plurality of iterations for conversion of the source code into the format of the target environment specification, the knowledge base is updated to include additional structured information of the source platform and the source application with respect to the target platform and the target environment specification after each iteration to cause the knowledge engine to enhance source code conversion in subsequent iterations".

In view of the amendments herein and the arguments set forth above, the combination of Pastilha and Goodman does not establish a prima facie case of obviousness with respect to independent claims 1, 7, and 13. Dependent claims are allowable for at least the same reasons. Accordingly, reconsideration and withdrawal of the § 103 rejections is respectfully requested.

In conclusion, Applicants submit that the claims as amended are patentable over the cited references and request that the application be allowed.

Respectfully Submitted,

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